

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIAN BAUMANN,

Plaintiff,

V.

CHARLES LORD,

Defendant.

Case No. 07-7228

Judge Zagel

Magistrate Judge Brown

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Charles Lord hereby moves for a thirty-day extension of time in which to answer or otherwise plead to Plaintiff Marian Baumann's Complaint. In support of this Motion, Lord states as follows:

1. Lord removed this action to this Court from the Circuit Court of Cook County, Illinois on December 26, 2007.
2. Under Federal Rule of Civil Procedure 81(c)(2)(C), Lord's answer or responsive pleading was originally due on January 4, 2008.
3. Both before and after Lord removed this action to this Court, the parties were engaged in attempts to resolve this matter.
4. On January 4, 2008, Lord filed an Unopposed Motion for Extension of Time to Answer or Otherwise Plead. In that Motion, Lord stated that the parties intended to submit this matter to mediation within the next thirty days, and he asked the Court to extend the deadline for his Answer by thirty days to allow time for the parties to attempt resolution. The Court granted that motion and extended Lord's deadline to February 4, 2008.

5. The parties then submitted this matter to mediation. The parties reached an oral agreement to resolve the matter.
6. On February 4, 2008, Lord filed another unopposed motion for an extension of time to answer or otherwise plead, so that the parties would have time to reduce their oral agreement to writing and see to other details of their resolution of this matter. The Court granted this motion and extended the deadline to March 5, 2008.
7. Since then, the parties have reduced their oral agreement to writing. However, the parties are still in the final stages of negotiating changes to the written agreement and seeing to other details of the resolution.
8. Accordingly, Lord asks for another thirty-day extension of the deadline to answer or otherwise respond to Baumann's Complaint. Lord expects that the parties will file a stipulation of dismissal during that thirty-day time frame.
9. Lord's counsel discussed this matter with Baumann's counsel prior to filing this Motion, and Baumann's counsel has no objection.

WHEREFORE, Lord respectfully requests that the Court grant this Motion and extend his deadline to answer or otherwise respond to the Complaint by thirty days, or until April 4, 2008.

Dated: March 5, 2008

CHARLES LORD

By: /s/ Jane M. McFetridge

One of His Attorneys

Jane M. McFetridge
Neil H. Dishman
Jackson Lewis LLP
320 West Ohio Street, Suite 500
Chicago, IL 60610
(312) 787-4949

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on March 5, 2008, he caused a true and correct copy of the foregoing Defendant's Unopposed Motion for Extension of Time to Answer or Otherwise Plead to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system, including:

William Lynch Schaller
Peter P. Tomczak
Baker & McKenzie LLP
Suite 3500
130 East Randolph
Chicago, IL 60601

/s/ Neil H. Dishman
Neil H. Dishman